

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Advanced Television Systems)
and Their Impact upon the) MM Docket No. 87-268
Existing Television Broadcast)
Service)

To: The Commission

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CONSOLIDATED OPPOSITION OF
PULITZER BROADCASTING COMPANY
TO PETITIONS FOR RECONSIDERATION

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Pulitzer Broadcasting Company ("Pulitzer"), the
licensee of nine television broadcast stations, two television
satellite stations, and the permittee of a third television
satellite station,^{1/} by its attorneys, hereby submits this
Consolidated Opposition to Petitions for Reconsideration of the
Fifth Report and Order^{2/} and the Sixth Report and Order^{3/} filed
in the above-referenced proceeding. Pulitzer hereby reiterates
its general support of the Commission's decisions in the Fifth

1/ Pulitzer, either directly or through wholly-owned
subsidiaries, is the licensee of the following television
broadcast stations: WDSU, New Orleans, LA; WESH, Daytona Beach,
FL; WGAL, Lancaster, PA; WLKY, Louisville, KY; WXII, Greensboro,
NC; WYFF, Greenville, SC; KCCI, Des Moines, IA; KETV, Omaha, NE;
and KOAT, Albuquerque, NM. In addition, Station KOAT operates
satellite television stations KOCT, Carlsbad, NM and KOVT, Silver
City, NM, and is the permittee for Station KOFT, Gallup, NM.

2/ Advanced Television Systems and Their Impact Upon the
Existing Television Broadcast Service, MM Docket No. 87-268, FCC
97-116, 62 Fed. Reg. 26966, (released April 21, 1997) ("Fifth
Report and Order").

3/ Advanced Television Systems and Their Impact upon the
Existing Television Broadcast Service, MM Docket No. 87-268, FCC
97-115, 62 Fed. Reg. 26684, Sixth Report and Order (released
April 21, 1997) ("Sixth Report and Order").

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Report and Order and the Sixth Report and Order, which adopted a nationwide DTV Table of Allotments and Assignments (the "initial DTV Table") and related rules. Pulitzer believes the public interest is best served by accepting the initial DTV Table and working with fellow broadcast licensees and the Commission's staff in constructive ways.

Clearly, widespread changes in the initial DTV Table and related rules would not serve the public interest by introducing significant delays, requiring extensive Commission resources, and likely creating yet another set of objections leading to additional reconsideration petitions and conflict among licensees. Pulitzer hereby opposes such changes.^{4/} Also, Pulitzer opposes the notion that LPTV licensees would dictate the DTV channel assignments of neighboring full-service stations.^{5/} The Commission's new rules are sufficient -- without changing full-service DTV channel assignments -- to provide special relief to as many LPTV licensees as possible. LPTV licensees should not be permitted to become driving forces in the DTV channel-assignment process on reconsideration.

Pulitzer is prepared to work with other television licensees to seek resolution of the various problems arising from the initial DTV Table, particularly where DTV service threatens

4/ See Petitions for Reconsideration of Association of Local Television Stations, Inc.; Paxson Communications Corp. et al; Sinclair Broadcasting Group, Inc.; and ViaCom, Inc.

5/ Pulitzer specifically opposes the Petition of Reconsideration of Max A. Trevino.

to introduce new interference to NTSC service during the transition. However, as advocated in Pulitzer's Petition,^{6/} existing television licensees should have the right to object during the transition to DTV-to-NTSC interference -- including the DTV-to-NTSC interference predicted in the initial DTV Table. If such complaints are not resolved by the parties through private negotiations, the Commission should impose a temporary transmission power limit on the DTV interference sources until such time as there is a significant DTV audience in the markets served by those DTV stations.

Many of the Petitions failed to make specific requests for DTV channel changes or increases in DTV transmission power or antenna height, stating that OET Bulletin 69 had not yet been issued. When OET Bulletin 69 was issued, the Commission decided to permit these petitioners to supplement their petitions on or before August 22, 1997.^{7/} Accordingly, Pulitzer cannot submit meaningful opposition to such petitions at this time, but urges the Commission to place any supplemental submissions on public notice, and to afford interested parties the opportunity to oppose in the future any requests for changes in the initial DTV Table supported by such supplemental submissions.

As a general matter, Pulitzer opposes all requests for changes in the initial DTV Table that would result in either new

6/ "Petition for Clarification and Partial Reconsideration of the Sixth Report and Order" filed June 13, 1997.

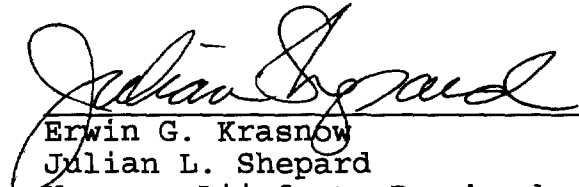
7/ See Order in MM Docket No. 87-268, DA 97-1377, released July 2, 1997.

interference to its full-service NTSC stations during the transition, or a permanent reduction in DTV coverage on any of its DTV channel assignments in the initial DTV Table.

Respectfully submitted,

PULITZER BROADCASTING COMPANY

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July 18, 1997

CERTIFICATE OF SERVICE

I, Bridget Y. Monroe, hereby certify that on this 18th day of July, 1997, caused a copy of the foregoing "Consolidated Opposition of Pulitzer Broadcasting Company to Petitions for Reconsideration" to be served by first class mail, postage prepaid to:

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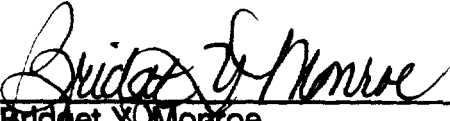
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